

Hazardous waste Generator/Transporter Compliance Inspection Report

General

Time 9:30 am Date July 22, 1993

Facility Name Fermenta Animal Health Company EPA ID No. KSD067925347

Street 15th and Oak City Elwood, KS Zip 66024

Mailing Address (if different than above) _____

County Doniphan Phone (913) 365-9070

Contact(s) Dan Davis, Bob Rossi

Inspector(s) Richard Bronaugh

Type of Business: Manufactures animal health products

Has the company declared any information/processes as trade secrets (KSA 65-3447)?
If yes, explain.

	Yes	No
	[]	[x]

Industrial Wastes Generated

(List hazardous waste first)

Waste:	Various flammable pesticide waste	Chlorinated lab solvents
If waste is hazardous, give HW ID Number:	D001	D001, F002
Amount generated per month:	55 gallon	55 gallon
Amount presently in storage:	12 drums	1 drum
Accumulation time:	1 month	1 month
Present disposal method:	Ensco Eldorado Springs, AK	Ensco Eldorado Springs, AK

Waste:	Non chlorinated lab solvents	Chloroform
If waste is hazardous, give HW ID Number:	D001, F003, F005	D022
Amount generated per month:	55 gallon	5 gallon
Amount presently in storage:	-	4 drums
Accumulation time:	Satellite	1 month
Present disposal method:	Ensco Eldorado Springs, AK	Ensco Eldorado Springs, AK

Waste:	Parts Washing Solvent	Isopropyl Alcohol and water
If waste is hazardous, give HW ID Number:	D001, D018, D035	D001
Amount generated per month:	50 gallon	12- 55 gallon drums
Amount presently in storage:	-	7
Accumulation time:	-	1 month
Present disposal method:	Safety-Kleen	Ensco Eldorado Springs, AK

Waste:	Nitrobenzene	Lab pack wastes
If waste is hazardous, give HW ID Number:	D036	D001,D002,D004,D007,D011,D018, D021,D039,F002,P012,P066,P119,
Amount generated per month:	varies	U080,U122,U213 varies
Amount presently in storage:	1 drum	1 drum
Accumulation time:	2 months	1 month
Present disposal method:	Ensco Eldorado Springs, AK	Ensco Eldorado Springs, AK

Waste:	Special non RCRA waste	
If waste is hazardous, give HW ID Number:	n/a	
Amount generated per month:	varies	
Amount presently in storage:	-	
Accumulation time:	-	
Present disposal method:	USPCI Lone Mountain Facility Waynoka, OK	

General Requirements (GER)

	Yes	No	NA
I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (KAR 28-31-4(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (KAR 28-31-4(b)(3)(A))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. If waste(s) was tested, are the results kept for three years? (KAR 28-31-4(f)(1)(C))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has written permission been obtained from the operator of the POTW? (KAR 28-31-3/40 CFR 261.4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (KAR 28-29-23)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A. If yes, list the authorization number(s): <u>93-202,8133,93-745,93889,93-448</u>			
IV. Facility size classification:			
<input type="checkbox"/> Not a Generator	<input type="checkbox"/> Small Qty. Generator	<input type="checkbox"/> Kansas Generator	<input checked="" type="checkbox"/> EPA Generator
<input type="checkbox"/> T/S/D Facility	<input type="checkbox"/> Transporter	<input type="checkbox"/> HW Burner/Marketer	<input type="checkbox"/> Used oil Burner/Marketer

Hazardous Waste Determination Requirements: ☒ Adequate ☐ Inadequate

Notification Requirements (GGR)

V. Has generator notified KDHE and obtained an EPA Identification Number? (KAR 28-31-4(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. Is current notification accurate? (KAR 28-31-4(c)(1))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A. Is this facility marketing (selling) hazardous waste as a fuel?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Is this facility marketing (selling) used oil as a fuel?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)			
C. Is this facility burning hazardous waste as a fuel?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Is this facility burning used oil as a fuel?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Notification Requirements: ☐ Adequate ☒ Inadequate ☐ NA

(If small quantity generator, stop here.)

Manifests (GMR)

	Yes	No	NA
VII. Is a contractual agreement used in place of manifesting? (KAR 28-31-4(d)(7)(A-C)/40 CFR 262.20(e)(1-2)) <i>see notes</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
A. If yes, does the contractual agreement include the type of waste and frequency of shipments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C. If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VIII. Is a current manifest showing revision date and burden disclosure statement used? (KAR 28-31-4(d)/40 CFR 262.20)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A. If yes, does manifest(s) include:			
1. Generator EPA Identification Number (12 digit) and manifest document number (five digit)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Number of pages?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Generator's name and mailing address?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Generator's phone number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Transporter 1 Name?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Transporter 1 EPA Identification Number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. Transporter 2 Name?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Transporter 2 EPA Identification Number?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Name and site address of designated facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10. Designated facility's EPA Identification Number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11. Waste Description (DOT shipping name, hazard class, and Identification Number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12. Number and type of containers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
13. Total quantity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
14. Unit (weight or volume)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
15. Special handling instructions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Generator's certification including waste minimization statement, generator's signature, and date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17. Name, signature, and date of transporter 1?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18. Name, signature, and date of transporter 2?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B. Does generator retain a copy of manifest(s) signed by both generator and transporter? (KAR 28-31-4(d)(4)(A-C))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C. Does generator retain copy of manifest(s) signed and dated by T/S/D facility owner/operator for three years? (KAR 28-31-4(f)(1)(A))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
D. Has generator ever failed to received a signed copy of a manifest within 45 days of initiating a shipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1. If yes, was exception report(s) filed? (KAR 28-31-4(f)(4)(B))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. If yes, was copy retained for three years? (KAR 28-31-4(f)(1)(A))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Manifesting Requirements

☐ Adequate

☒ Inadequate

☐ NA

Land Disposal Restrictions Requirements (GLB)

- | | Yes | No | NA |
|---|-------|-----|----|
| IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? | [x] | [] | |

List these wastes:

A. D001 D. F002

B. F003 _____ E. F005 _____

C. D022 F. and others

- X. Is the waste(s) covered by a National Variance(s), Extension, or Petition?(40CFR 268 5&6) [] [x]
 A. If yes, describe the variance, extension, or petition which applies:

- XI. Is the waste covered by an exemption? (40 CFR 268.1(c)(2)) [] [x]
 A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40 CFR 268.7(a)(3)) [] []

- XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? [x] []
- A. If yes, does the generator provide a notification to T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40 CFR 268.7) [x] []

- B If yes, is a copy of this notification kept for five years? ☒ ☐

- XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If yes, fill out land disposal restrictions checklist.) [] [x]

Land Disposal Restrictions Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Pre-Transport Requirements (GPT)

- XIV. Does generator package waste in accordance with DOT requirements?(KAR 28-31-4(e)(1)) ☒ ☐ ☐

- XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (KAR 28-31-4(e)(2)) ☒ ☐ ☐

- XVI. Does generator mark (consignee's or consignor's name and address, etc.) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (KAR 28-31-4(e)(3)) ☒ ☐ ☐

- A. Does generator mark each container of 110 gallons or less as below? [x] [] []
(KAR 28-31-4(e)(3))

Hazardous Waste - Federal Law Prohibits Improper Disposal
If found, contact the nearest police or public safety authority or the US EPA

Generator's Name and Address

Manifest Document Number

- XVII. Does generator have placards to offer to transporters in accordance with 40 CFR 172 Subpart F? (KAR 28-31-4(e)(4)) ☒ ☐ ☐

Yes No NA

XVIII. Does generator only use a transporter who is properly registered with the department? (KAR 28-31-4(c)(2))

[x] [] []

Pre-Transport Requirements:

[x] Adequate

[] Inadequate

[] NA

Biennial Reports (GRR)

XIX. Has generator submitted a biennial report(s) to KDHE? (KAR 28-31-4(f)(2))

[x] [] []

A. If yes, does generator retain copies for three years? (KAR 28-31-4(f)(1)(B))

[x] [] []

(Note: compare quantities reported on last biennial report with the total quantity of all manifests for those years.)

Biennial Report Requirements:

[x] Adequate

[] Inadequate

Special Conditions (GSC)

XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E & F)

[] [x]

A. If yes, has generator filed a notice with the Secretary of Health and Environment?

[] [] [x]

B. Is waste manifested and signed by a foreign consignee?

[] [] [x]

C. If generator transports waste out of the country, has confirmation of delivered shipment been received?

[] [] [x]

Special Conditions Requirements:

[x] Adequate

[] Inadequate

[] NA

Storage Requirements (GPT)

XXI. Does generator temporarily store waste before transport?

[x] []

A. For 90 days or less?

[x] [] []

B. For more than 90 days?

[] [x] []

C. If waste is stored in containers?

1. Are containers marked with the words: "Hazardous Waste"? (KAR 28-31-4(g)(3) or (h)(1)(D))

[] [x] []

2. Is the accumulation start date marked on each container? (KAR 28-31-4(g)(2) or (h)(1)(C))

[] [x] []

3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (KAR 28-31-4(g)(1) or (h)(1)(B))

[x] [] []

4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (KAR 28-31-4(k))

[] [x] []

a. If yes, are these inspection documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (KAR 28-31-4(k)/40 CFR 265.15(d))

[] [x] []

- | | Yes | No | NA |
|--|-------|-------|-------|
| 5. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (KAR 28-31-4(g)(1)/40 CFR 265.176) | [x] | [] | [] |
| 6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall or other means? (KAR 28-31-4(g)(1) or (h)(1)(B)/40 CFR 265.177) | [] | [] | [x] |
| 7. Does generator have any satellite storage areas? (KAR 28-31-4(j)) | [x] | [] | [] |
| If yes, | | | |
| a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? | [x] | [] | |
| b. Is the container in good condition and closed except to add or remove waste? | [] | [x] | |
| c. Is the container marked with the words: "Hazardous Waste"? | [] | [x] | |
| d. Is the container marked with the accumulation start date at the time it becomes full? | [x] | [] | |
| e. Is the full container moved to the storage area within three days after it became full? | [x] | [] | |

(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)

Storage Requirements:

[] Adequate

[x] Inadequate

[] NA

Kansas Generator's Emergency Preparedness (GSO)

- XXII. Has facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E)) [] []
- A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? [] []
- B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? [] []
- C. Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? [] []
- XXIII. Is the following information posted next to at least one telephone which is immediately assessable in an emergency? (KAR 28-31-4(h)(1)(F))
- A. Name and telephone of emergency coordinator? [] []
- B. Location of fire extinguishers, fire alarms, or spill control material, if available? [] []
- C. Telephone number of fire department unless the facility has a direct alarm? [] [] []
- XXIV. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? (KAR 28-31-4(h)(1)(G)) [] []
- A. Is this training documented in any way? [] []

Kansas Generator's Emergency Preparedness Requirements:

[] Adequate

[] Inadequate

[x] NA

(If Kansas generator, stop here.)

Preparedness and Prevention (GPT)

	Yes	No	NA
XXV. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:			
A. Internal communication or alarm system easily accessible in case of emergency? (KAR 28-31-4(g)(4)/40 CFR 265.32(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (KAR 28-31-4(g)(4)/40 CFR 265.32(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (KAR 28-31-4(g)(4)/40 CFR 265.32(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc? (KAR 28-31-4(g)(4)/40 CFR 265.32(d))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E. Is this equipment (A-C above) tested and maintained to ensure its proper operation? (KAR 28-31-4(g)(4)/40 CFR 265.33)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (KAR 28-31-4(g)(4)/40 CFR 265.35)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:			
A. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Designated one authority where one or more police or fire departments might respond to an emergency? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Preparedness and Prevention Requirements:	<input checked="" type="checkbox"/> Adequate	<input type="checkbox"/> Inadequate	<input type="checkbox"/> NA
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Personnel Training (GPT)

XXIX. Has the owner/operator established a hazardous waste management training program? (KAR 28-31-4(g)(4)/40 CFR 265.16)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A. Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C. Are new employees supervised until training is completed? (40 CFR 265.16.(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E. Does the facility maintain the following documents and records:		
1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1)&(2))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Records of training given to facility personnel? (40 CFR 265.16(d)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Personnel Training Requirements:	<input checked="" type="checkbox"/> Adequate	<input type="checkbox"/> Inadequate
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Contingency Plan (GPT)

	Yes	No
XXX. Does the facility have a contingency plan? (KAR 28-31-4(g)(4)/40 CFR 265 Subpart D) If yes,	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Is an emergency coordinator available at all times? (40 CFR 265.55)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Contingency Plan Requirements:

☐ Adequate

☒ Inadequate

(If EPA generator, stop here.)

Transporter Requirements (TRR)

	Yes	No
XXXI. Does this facility transport hazardous waste?		
If yes,		
A. Are they registered as a hazardous waste transporter in the State of Kansas? (KAR 28-31-6(b))	[]	[]
B. Does transporter comply with the manifest requirements of 40 CFR part 263.20 except 263.20(h)?	[]	[]
C. Does transporter retain a copy of the manifest for three years? (40 CFR 263.22(a))?	[]	[]
D. Does this facility transport hazardous waste subject to the manifest exemption of KAR 28-31-4(d)(7)?	[]	[]
If yes,		
1. Does the transporter record the name, address, and EPA ID Number of the generator; quantity of waste shipped; DOT shipping information; and the date the waste was accepted in a log or shipping paper?	[]	[]
2. Does the transporter carry this record when transporting the waste to the reclamation facility?	[]	[]
3. Does the transporter retain these records for a period of three years after the termination or expiration of the agreement?	[]	[]

Transporter Requirement:

[] Adequate

[] Inadequate

[x] NA

Additional Information and Conclusions:

The facility is using a contractual agreement to dispose of parts washing solvent. As an EPA generator, a manifest is required for disposal and this is a violation.

Several 1 pint containers in the storage area were not marked with the words "hazardous waste" and did not have the accumulation start date.

One 30 gallon satellite container in the quality control lab was not closed. One 55 gallon satellite drum in the Denegard formulation room was not marked and was not closed.

The contingency plan has been provided to the outside emergency agencies but documentation could not be provided.

**FERMENTA ANIMAL HEALTH COMPANY
15TH AND OAK
ELWOOD, KANSAS**

WASTES GENERATED AT THIS LOCATION:

1.	Flammable pesticide waste	D001
2.	Chlorinated lab solvents	D001,F002
3.	Non chlorinated lab solvents	D001,F003,F005
4.	Chloroform	D022
5.	Safety-Kleen Solvent	D001,D018,D035
6.	Isopropyl alcohol/water	D001
7.	Nitrobenzene	D036
8.	Lab pack waste	D001,D002,D004,D007,D011 D018,D021,D039,F002,P012 P066,P119,U080,U122,U213

VIOLATIONS:

1. When there is a change in the information originally submitted to obtain an EPA identification number, the generator must update that information. K.A.R. 28-31-4 (C)(1).
2. A contractual agreement is being used in place of manifesting Safety-Kleen parts washing solvent. As an EPA generator, this hazardous waste must be manifested when shipped. K.A.R. 28-31-4(d)(7)(A-C).
3. A number of 1 pint containers of lab pesticide waste were not marked with the words "Hazardous Waste" and the accumulation start date as required by K.A.R. 28-31-4(g)(2 and 3).
4. One 55 gallon drum of Nitrobenzene contaminated spill material was not marked with the words "Hazardous Waste" and the accumulation start date as required by K.A.R. 28-31-4(g)(2 and 3).
5. Four 5 gallon containers of solvent residue were not marked with the words "Hazardous Waste" and the accumulation start date as required by K.A.R. 28-31-4(g)(2 and 3).
6. The facility was are not conducting documented weekly inspections of hazardous waste storage containers as required.K.A.R. 28-31-4(g)(1) and (k).
7. One 30 gallon satellite drum in the quality control lab was not closed and one 55 gallon satellite drum in the Denegard formulation room was not marked with the words "hazardous waste" and was not closed as required by K.A.R. 38-31-4(j)(1)(A & B).

ADDITIONAL INFORMATION:

Fermenta was formerly known as Tech America and Medico. In 1987 a facility called Fermenta in Princeton, New Jersey purchased Medico. They moved the operation to Elwood in 1989

Medico strengths were in producing sterile pharmaceutical products for animals. Fermenta strengths lie in feed additives. Fermenta now manufactures pharmaceutical products, feed additives and products that combine the two area. They also produce other products such as flea collars etc.

Fermenta shares in a world wide market. They employ 175 full time people normally working 2 shifts but in busy times they work 3 shifts.

There are satellite containers in the quality control labs and in the Denegard formulation room.

Processed waste (mops, plastic liners, floor cleanup) is shipped to U.S.P.C.I., Lone Mountain Facility, Waynoka, OK

Towels and Uniforms are laundered by Nu-Way in St Jo, MO

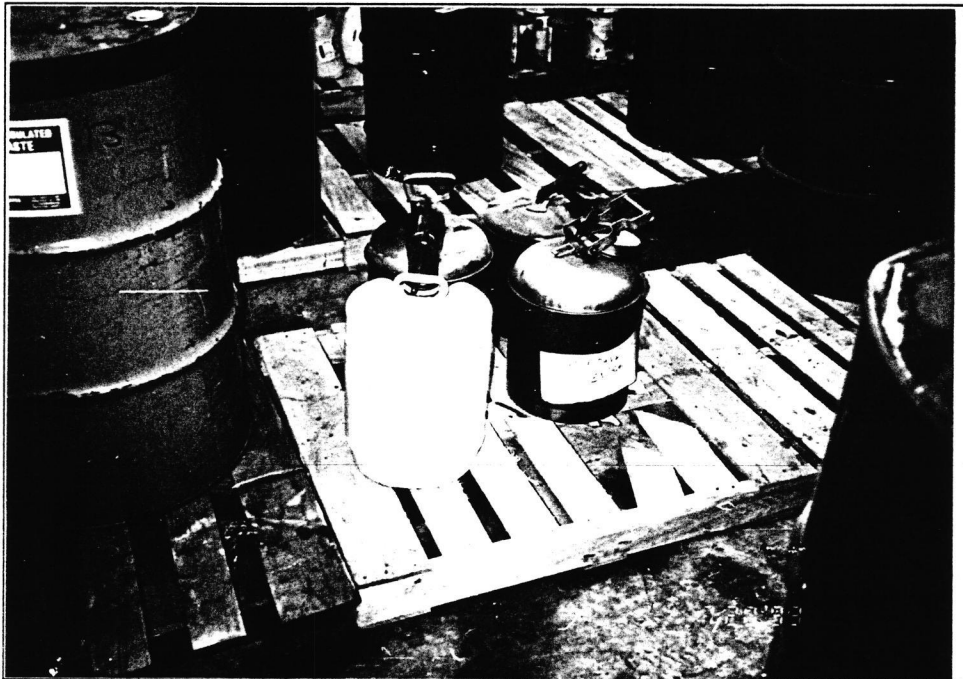
Waste oil is handled by Industrial Services.

BOW has indicated that since the discharge from the cooling tower was accidental and is not a regular discharge, no further action will be taken.

Since the inspection and the time this summary is being written, Elwood KS was covered with flood water (Flood of 93) from the Missouri River. The hazardous waste storage area was filled with flood water. I have been in contact with Bob Rossi and he said when they got word that the river may flood, they packed all the small loose containers into drums and sealed them. According to Mr. Rossi, 5 - 6 feet of water got into the storage building but all containers remained in the building.

Department of Health and Environment
Division of Environment
PHOTO MOUNTING SHEET

Name of Site: Fermenta Animal Health EPA ID# KSD067925347
Location: City Elwood County Doniphan Legal 15th and Oak



Picture No. 1
Date: 7-20-93
Time: 3:30 pm
Direction
Facing: east
Weather Conditions:
inside
Camera: Olympus 35mm
Comments: Four
unmarked 5 gallon
containers.



Picture No. 2
Date: 7-20-93
Time: 3:30 pm
Direction
Facing: east
Weather Conditions:
inside
Camera: Olympus 35mm
Comments: bottles
of various stuff,
some hazardous
waste. Containers
not marked.

Department of Health and Environment
Division of Environment
PHOTO MOUNTING SHEET

Name of Site: Fermenta Animal Health EPA ID# KSD067925347
Location: City Elwood County Doniphan Legal 15th and Oak



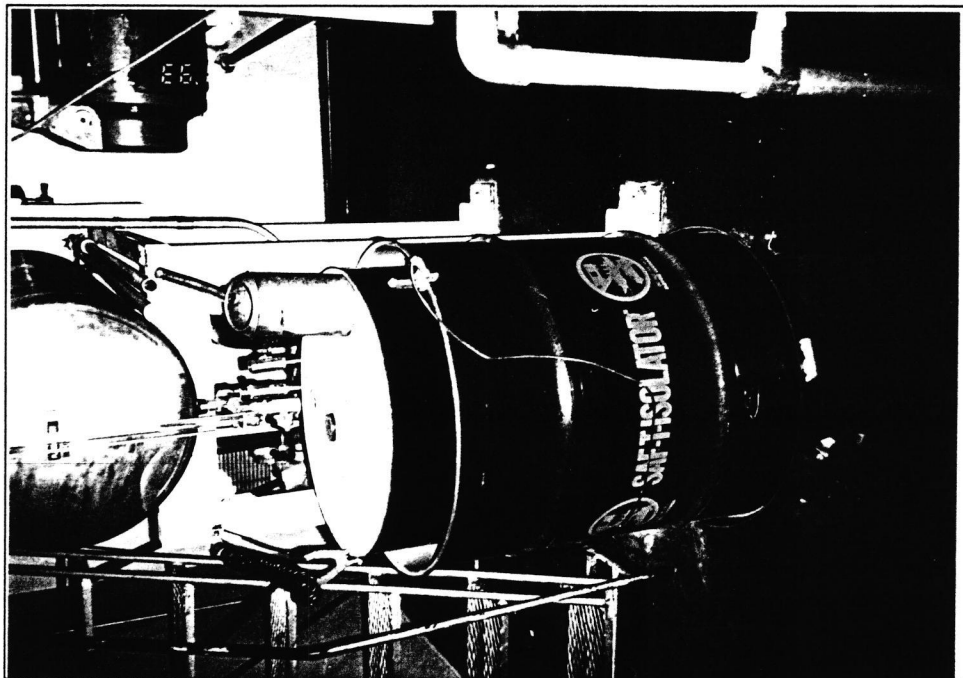
Picture No. 3
Date: 7-20-93
Time: 10:30 am
Direction
Facing: ?
Weather Conditions:
inside
Camera: Olympus 35mm
Comments: Open
satellite container
in QC lab.



Picture No. 4
Date: 7-20-93
Time: 3:30 pm
Direction
Facing: east
Weather Conditions:
inside
Camera: Olympus 35mm
Comments: bottles
of various stuff,
some hazardous
waste. Containers
not marked.
(Close up.)

Department of Health and Environment
Division of Environment
PHOTO MOUNTING SHEET

Name of Site: Fermenta Animal Health EPA ID# KSD067925347
Location: City Elwood County Doniphan Legal 15th and Oak



Picture No. 5
Date: 7-20-93
Time: 11:30 am
Direction
Facing: ?
Weather Conditions:
inside
Camera: Olympus 35mm
Comments: Open
and unmarked
satellite drum in
Denegard production
room.



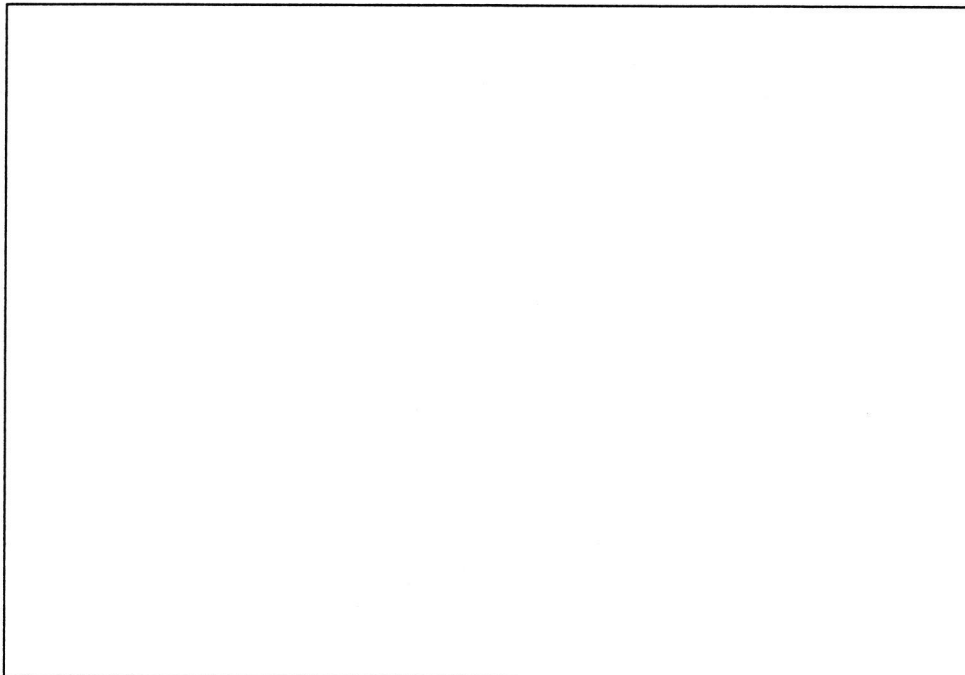
Picture No. 6
Date: 7-20-93
Time: 9:30 am
Direction
Facing: east
Weather Conditions:
cloudy
Camera: Olympus 35mm
Comments: area
where cooling
tower water ran
off building and
accumulated in the
ditch at upper
portion of picture

Department of Health and Environment
Division of Environment
PHOTO MOUNTING SHEET

Name of Site: Fermenta Animal Health EPA ID# KSD067925347
Location: City Elwood County Doniphan Legal 15th and Oak



Picture No. 7
Date: 7-20-93
Time: 9:00 am
Direction
Facing: north
Weather Conditions:
cloudy
Camera: Olympus 35mm
Comments: Cooling
tower that
malfunctioned and
caused discharge to
the ground. Note
hose that now will
prevent accidental
discharge except to
sanitary sewer.
This will be
replaced with
plastic pipe.



Picture No. _____
Date: _____
Time: _____
Direction
Facing: _____
Weather Conditions:

Camera: Olympus 35mm
Comments: _____



**Hazardous Waste Compliance
Monitoring and Enforcement Log**

RECEIVED
BUREAU OF
AUG 12 1993 FORM
A
WASTE MANAGEMENT

HANDLER LDF () TSF () GEN (X) KG () SQ () TRA ()
ID NUMBER: KSD067925347 HWM () HWB () UOM () UOB () NOT A GEN ()

HANDLER NAME: FERMENTA ANIMAL HEALTH CO AT 9/15/93 CL 8-31-93
FT 8-23-93 RCRIS 9/28/93

STREET: 15th and OAK **CITY:** ELWOOD

EVALUATION New ☒ Followup ☐ Delete ☐

Date 9/3 07 22 Agency S Type CEI Reason 04 Person RRB District ME

Areas of Evaluation (EV - Evaluted, NE - Not Evaluted, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other					
GER	<input type="checkbox"/>	GPT	<input checked="" type="checkbox"/>	TGR	<input type="checkbox"/>	DCH	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DPP	<input type="checkbox"/>	CAS	<input type="checkbox"/>
GGR	<input checked="" type="checkbox"/>	GRR	<input checked="" type="checkbox"/>	TMR	<input type="checkbox"/>	DCL	<input type="checkbox"/>	DIN	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DSI	<input type="checkbox"/>
GLB	<input checked="" type="checkbox"/>	GSC	<input checked="" type="checkbox"/>	TOR	<input type="checkbox"/>	DCP	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DTR	<input type="checkbox"/>
GMR	<input checked="" type="checkbox"/>	GSQ	<input type="checkbox"/>	TRR	<input type="checkbox"/>	DFR	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DOT	<input type="checkbox"/>	DTT	<input type="checkbox"/>
GOR	<input checked="" type="checkbox"/>			TWD	<input type="checkbox"/>	DGS	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DPB	<input type="checkbox"/>	DWP	<input type="checkbox"/>

COMMENTS

VIOLATION # 1 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency S Number 1 Area GGR Class 2 Priority Type SR

Regulation Citation: KAR 28-31-4 (C)(1)

Date Determined 07 22 93 Returned to Compliance

Scheduled: 08 30 93 Actual:

VIOLATION # 2 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency S Number 2 Area GMR Class 2 Priority Type SR

Regulation Citation: KAR 28-31-4 (C)(7)(A-C)

Date Determined 07 22 93 Returned to Compliance

Scheduled: 08 30 93 Actual:

VIOLATION # 3 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency S Number 3 Area GPT Class 2 Priority Type SR

Regulation Citation: KAR 28-31-4 (g)(2+3)

Date Determined 07 22 93 Returned to Compliance

Scheduled: 08 30 93 Actual:

VIOLATION # 4 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency S Number 4 Area GPT Class 2 Priority Type SR

Regulation Citation: KAR 28-31-4 (g)(2+3)

Date Determined 07 22 93 Returned to Compliance

Scheduled: 08 30 93 Actual:

fermenter animal

Hazardous Waste Compliance Monitoring and Enforcement Log

FORM
B

ID Number: K5D834095287

Handler Name: FERMENTA

VIOLATION # 5 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency	Number	Area	Class	Priority	Type
S		GPT	2		SR

Regulation Citation: KAR 28-31-4 (g) (243)

Date Determined: MM 07 DO 22 YY 93

Returned to Compliance: MM 08 DO 30 YY 93

Scheduled:

Actual:

VIOLATION # 6 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency	Number	Area	Class	Priority	Type
S		GPT	2		SR

Regulation Citation: KAR 28-31-4 (K)

Date Determined: MM 07 DO 22 YY 93

Returned to Compliance: MM 08 DO 30 YY 93

Scheduled:

Actual:

VIOLATION # 7 Link to:

New ☒ Change ☐ Delete ☐ Comments ☐

Agency	Number	Area	Class	Priority	Type
S		GPT	2		SR

Regulation Citation: KAR 28-31-4 (j) (1) (A+B)

Date Determined: MM 07 DO 22 YY 93

Returned to Compliance: MM 08 DO 30 YY 93

Scheduled:

Actual:

VIOLATION # Link to:

New ☐ Change ☐ Delete ☐ Comments ☐

Agency	Number	Area	Class	Priority	Type
S					

Regulation Citation:

Date Determined: MM DO YY

Returned to Compliance: MM DO YY

Scheduled:

Actual:

VIOLATION # Link to:

New ☐ Change ☐ Delete ☐ Comments ☐

Agency	Number	Area	Class	Priority	Type
S					

Regulation Citation:

Date Determined: MM DO YY

Returned to Compliance: MM DO YY

Scheduled:

Actual:

VIOLATION # Link to:

New ☐ Change ☐ Delete ☐ Comments ☐

Agency	Number	Area	Class	Priority	Type
S					

Regulation Citation:

Date Determined: MM DO YY

Returned to Compliance: MM DO YY

Scheduled:

Actual:

ENFORCEMENT New ☒ Change ☐ Delete ☐

Date 93 08 09 Number Agency S Type 120 District 41 Person KRB

COVERED VIOLATIONS

Agency	Violation Number	Area	Agency	Violation Number	Area	Agency	Violation Number	Area
S	1	GGR	S	5	GPT	S		
S	2	GMR	S	6	GPT	S		
S	3	GPT	S	7	GPT	S		
S	4	GPT	S			S		

Comments: